

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS AT BOSTON

HEATHER KIERNAN,

Plaintiff,

-v-

CIVIL NO. 04-10131 RBC

ARMORED MOTOR SERVICE OF
AMERICA, INC., and
FRANCESCO CIAMBRIELLO

Defendants.

SUPPLEMENTAL JOINT PRETRIAL MEMORANDUM¹

Pursuant to the Court's Electronic Order granting the Joint Motion to Permit the Filing of a Supplemental List of Exhibits and Witnesses [Docket no. 76], the Plaintiff and the Defendant Armored Motor Service of America (AMSA, hereby submit the following:

1. Supplemental Exhibit List:²

a. For the Plaintiff:

i. Armored Motor Services of America, Inc.'s Position

Statement and Answer to the MCAD Charge of
Discrimination;

ii. Defendant Francesco Ciambriello's Answer to the Complaint
dated March 10, 2004.

¹ Filed by Plaintiff and Defendant AMSA.

² Written objections must be served and filed by the close of business, Wednesday, April 25, 2007.

iii. Complaint filed by Heather Kiernan dated January 20, 2004.

b. For the Defendant AMSA:

- i. Separation Agreement between Heather Kiernan and John Kiernan dated September 11, 2006;
- ii. Affidavit of John Kiernan dated April 5, 2006;
- iii. Police Report of Gerald Larsen;
- iv. Police Report of Officer Susan Boisse;
- v. Supplemental Police Report of Officer John Otrando;
- vi. AMSA Sexual Harassment Training Materials;
- vii. Selected Portions of Video from AMSA Security Video of May 19, 2001 showing:
 - Ms. Kiernan and Mr. Ciambriello entering branch manager's office;
 - Ms. Kiernan and Mr. Ciambriello smoking cigarettes in parking lot of AMSA;
 - Ms. Kiernan leaving branch manager's office and Ms. Kiernan and Mr. Ciambriello in break room office;
 - Ms. Kiernan in dispatch area.

2. Supplemental Witness List³

a. For the Plaintiff:

- i. Diane L. Depippo, formerly at New Hope, Incorporated.
- ii. Officer Gerald Larsen
- iii. Officer Russell Castro

b. For the Defendant AMSA:

- i. Larry Silvestre

DATED: April 20, 2007

Respectfully submitted:
HEATHER KIERNAN

/s/ William J. McLeod
William J. McLeod, (BBO #560572)
McLEOD LAW OFFICES, PC
77 Franklin Street
Boston, MA 02110
617.542.2956/phone
617.695.2778/fax
wjm@mcleodlawoffices.com

ARMORED MOTOR SERVICES OF AMERICA, INC.

/s/ Allison K. Romantz
Allison K. Romantz (BBO # 554909)
MORGAN, BROWN & JOY LLP
200 State Street
Boston, MA 02109
617.523.6666/phone
aromantz@morganbrown.com

³ Motions in Limine pertaining to these disclosures must be filed by the close of business on Wednesday, April 25, 2007.